

Notes

- Buffalo Trace has rickhouses made from wood, tin, brick, and concrete ([Whisky Wash Article](#))
- The Distilled Spirits Council of the United States (DISCUS) “Recommended Fire Protection Practices for Distilled Spirits Beverage Facilities” manual requires either mechanical or natural ventilation to keep the concentration of vapors in the air at or below 25 percent of the lower flammable limit ([NFPA Article](#))
 - Appears the manual is non-enforceable because in intro it says “This publication is a suggested, voluntary guide for application primarily to new installations of distilled spirits production plants, including storage and warehouse facilities. It is not intended in any way to be an industry standard or code for regulatory purposes.”
 - The 2020 version of manual is \$250 for federal employees – could only find table of contents ([DISCUS Manual TOC](#))
- Vermont – “The Air Pollutions Control Officer has determined that the aging of whiskey, or other distilled spirits, in wooden barrels is an air contaminant source if the potential annual emissions of ethanol exceeds 5 tons.”
- Anheuser-Busch (malt beverage, not whiskey) RACT VOC rule in New Hampshire in 2002 ([Final Order](#)). In NY permit, VOC RACT is applicable when hourly emissions are greater than 3 lb/hr ([Title V Permit](#)).
- Connecticut – as of 2002, no distilleries partake in aging in the state ([State Inventory](#))
- Jack Daniel – 1994 EPA HQ states whiskey emissions are fugitive ([TN APC letter 1994](#))

Region V

There have been multiple changes where VOC emissions from rickhouses/warehouses for aging whiskey have been considered both non fugitive and fugitive at the same source based on different permit applications/renewals. A court ruling was made in 2004 stating that warehouse emissions are fugitive, yet in 2015 an operating permit counts them during emissions calculations to determine Title V eligibility. That source, however, lists the warehouse emissions as fugitive in their 2020 renewal permit.

- Joseph E. Seagram & Sons, Inc. – Per an [Objection to the Issuance of Part 70 Operating Permit](#) for Joseph E. Seagram & Sons in 2004, VOC emissions are fugitive because although they pass through the functional equivalent of a vent, there is no way that they can be reasonably collected. There is no distillery currently collecting warehouse/rickhouse emissions. The Title V and Minor Source Permit referenced are below.
 - 1999 [Title V Permit](#) – Based on Indiana Department of Environmental Management (IDEM) comments included in a response to comments, Region V did not consider warehouse/rickhouse emissions fugitive. No NSPS was required for this permit. PSD was not required because the source was constructed before August 7, 1977.
 - “IDEM and US EPA Region V have determined that the VOC emissions from the whiskey aging process are not fugitive. The definition of fugitive emissions are those which can not reasonably be contained. Since the emissions are already contained by a warehouse, they are by definition not fugitive. Containment is not an issue of whether the emissions can be reasonably controlled. The argument that the costs of control would be prohibitive and that controlling the emissions would adversely affect the natural whiskey aging process is not an issue because IDEM is not making a determination of whether controlling the emissions is reasonable. Therefore, this source is subject to the Part 70 Operating Permit Program.”
 - 2005 [Minor Source Operating Permit](#) – Source Ingoes from Title V source to minor source because “because fugitive emissions are not included towards permit applicability. This source’s VOC emissions are fugitive” (This source is no longer operating as of 2010 - [Revocation](#))
- MGPI Lawrenceburg– change from rickhouse emissions not being fugitive to being fugitive
 - 2015 [Title V SSM Permit](#) – MGPI counts warehouse/rickhouse emissions as non-fugitive and includes them in VOC emissions calculated in Appendix A (page 286 of pdf)
 - No BACT is specified for the warehouse emissions
 - 2020 [Title V Renewal Permit](#) – MGPI counts warehouse/rickhouse emissions as fugitive as shown in VOC fugitive emissions calculated in Appendix A (page 302 of pdf)
- MGPI Sunman
 - 2019 [Minor Source Operating Permit](#) – VOC warehouse/rickhouse emissions are considered fugitive, also states “U.S. EPA has not identified any reasonably available control technology (RACT) for ethanol emissions from alcohol beverage aging warehouses”
- Unclear if [Illinois Corn Processing LLC Permit](#) includes aging warehouse/rickhouse or not, included in [Statement of Basis](#) but not Title V permit